

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

CCI ENVIRONMENTAL, INC., et al.,)	
)	
Plaintiffs,)	
)	
v.)	No. 4:19-cv-03099 RWS
)	
CITY OF ST. LOUIS, et al.,)	
)	
Defendants.)	

JOINT MOTION TO AMEND CASE MANAGEMENT ORDER

COME NOW the parties, by and through their respective counsel, and hereby submit the following joint motion to further amend the April 14, 2020, Case Management Order.

In support, the parties state:

1. At the request of the parties, the Court previously amended its initial case management order (ECF 22) by granting the parties further time to complete discovery on preliminary legal issues, ECF 24 (docket text order).
2. The parties have provided initial disclosures and plaintiff has taken the corporate designee deposition of defendant City.
3. Plaintiffs have not yet been able to complete and serve their responses to defendants' discovery requests, and the corporate designee witness (who recently left City employ) has not been able to review and sign her deposition.
4. The parties are in agreement that additional time is needed to complete discovery and prepare cross-motions on the preliminary legal issues.

5. The parties therefore request that the date for discovery completion be moved to July 15, 2020, and that the cross-motions for summary judgment be filed by August 5, 2020, with opposition briefs filed by August 25, 2020. Reply briefs to be filed by September 4, 2020.

Date: July 7, 2020

Respectfully submitted,

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